

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED PUBLIC WORKERS,)	CIVIL NO. CV03-00598 DAE LEK
AFSCME, LOCAL 646, AFL-CIO,)	
MUTUAL AID FUND TRUST,)	DECLARATION OF COUNSEL
)	
Plaintiffs,)	
)	
vs.)	
)	
GARY RODRIGUES,)	
)	
Defendant.)	
_____)	

DECLARATION OF COUNSEL

I, CHARLES A. PRICE, declare as follows:

1. I am an attorney licensed to practice law in all courts of the State of Hawaii and am the attorney for Plaintiff in this action.
2. In order to prepare and present said Plaintiff's claims, it is necessary to take the deposition upon oral examination of Albert Hewitt. The testimony of this witness will be relevant to the issues involved in the instant action.
3. It is necessary and proper that a commission be issued from this Court in order to secure the testimony of said deponent upon oral examination.

4. A true and correct copy of the Notice of Taking Deposition Upon Oral Examination for the deposition of Albert Hewitt is attached hereto as Exhibit "A" and incorporated herein by reference.

5. All parties have been given due notice of the taking of said deposition as is shown by the Notice of Taking Deposition Upon Oral Examination attached hereto as Exhibit "A".

I declare under penalty of perjury that the above is true and correct.

Dated: Honolulu, Hawaii, October 30, 2006.



CHARLES A. PRICE